UNITED	STATES	DISTRIC	ΓCOURT
SOUTHE	RN DIST	RICT OF	NEW YORK

TAMARA WILSON, individually and on : Case No.: 21-cv-11228-JSR Behalf of all others similarly situated, : Plaintiff, : v.

TRILLER, INC., a Delaware corporation,

Defendant.

: -----X

NOTICE OF MOTION TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that, pursuant to the Court's February 14, 2022 Order [Dkt. 24], and upon the accompanying Memorandum of Law dated February 28, 2022, and Declaration of M. Darren Traub dated February 28, 2022, Defendant Triller, Inc. ("Triller"), by its undersigned counsel, will move this Court before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan Building and United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an Order dismissing the Class Action Complaint [Dkt. 1] with prejudice for failure to state a claim upon which relief can be granted and granting such other and further relief as this Court may deem just and proper; and that this Court has ordered answering papers by March 14, 2022 and reply papers by March 21, 2022, with oral argument set for March 28, 2022 at 2:00 pm.

Dated: February 28, 2022 Respectfully submitted,

BAKER & HOSTETLER LLP

/s/ Eric R. Fish
Eric R. Fish

45 Rockefeller Plaza New York, NY 10111 Tel: 212.589.4200 Fax: 212.589.4201

efish@bakerlaw.com

Joel Griswold (*pro hac vice*) SunTrust Center 200 South Orange Avenue, Suite 2300 Orlando, Florida 32801-3432

Tel: 407-649-4088 Fax: 407-841-0168

jcgriswold@bakerlaw.com

Bonnie Keane DelGobbo (*pro hac vice*) Amy L. Lenz (*pro hac vice*) One North Wacker Drive, Suite 4500 Chicago, Illinois 60606

Tel: 312-416-6200 Fax: 312-416-6201

<u>bdelgobbo@bakerlaw.com</u> alenz@bakerlaw.com

Attorneys for Defendant Triller, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **NOTICE OF MOTION TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT** was served on this 28th day of February 2022, via the Court's electronic filing system on all counsel of record.

/s/ Eric R. Fish	